

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA, for the Use  
and Benefit of CECCANTI, INC., a  
Washington corporation,

Plaintiffs,

v.

HARTFORD FIRE INSURANCE  
COMPANY, a Connecticut corporation,

Defendant.

Case No. 3:22-cv-05103-BHS

STIPULATED MOTION TO EXTEND  
CERTAIN PRE-TRIAL DATES

**NOTE ON MOTION CALENDAR:  
WEDNESDAY, DECEMBER 21, 2022**

**I. STIPULATED MOTION**

Plaintiff and Defendant (collectively, the “**Parties**”), by and through their respective counsel, stipulate and respectfully request the Court grant an extension of the discovery and dispositive motions deadline in this matter as set forth in the Court’s Order Setting Jury Trial and Pretrial Dates (ECF 13).

Specifically, the Parties request the Court extend these deadlines as follows:

Event	Current Date	Proposed Revision
Discovery completed by	January 3, 2023	January 31, 2023
All dispositive motions must be filed by	February 1, 2023	February 15, 2023

STIPULATED MOTION TO EXTEND CERTAIN PRE-TRIAL DATES  
[NO. 3:22-cv-05103-BHS] - 1

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Good cause exists to grant this limited request to modify certain dates in the Scheduling Order. The Parties recently engaged in Alternative Dispute Resolution and continue to work to see if they can resolve this matter without further litigation. *See, e.g., Rollins v. Traylor Bros Inc.*, 2017 WL 2215778, \*2 (W.D. Wash. 2017) (Finding good cause to continue trial to allow the parties to complete discovery and to facilitate potential settlement negotiations). A brief extension of the discovery and dispositive motions deadlines will allow the Parties additional time to see if they can resolve their dispute while limiting the attorneys' fees and costs incurred in litigation. The Parties do not request to move any other dates—including the trial date—at this time.

DATED: December 22, 2022

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*Attorneys for Plaintiff Ceccanti, Inc.*

*Attorneys for Defendant Hartford Fire Insurance Company*

## II. ORDER

IT IS SO ORDERED.

DATED this 22nd day of December, 2022.



BENJAMIN H. SETTLE  
United States District Judge

1 Presented by:

2 ASHBAUGH BEAL, LLP

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11 *Attorneys for Plaintiff Ceccanti, Inc.*

*Attorneys for Defendant Hartford Fire  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

***Attorneys for Plaintiff:***

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DATED this 21st day of December, 2022.

s/ Paul B. Mora  
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